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By ECF

September 23, 2022

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This letter relates to *Sow, et. al. v. City of New York, et. al.*, 21-cv-533

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and one of the attorneys assigned to represent defendants in the above referenced matter. Defendants write to respectfully request a six-day extension from September 23, 2022 until September 29, 2022, to respond to plaintiffs' letter to the Court filed on September 21, 2022, (Dkt. No. 742) seeking an order compelling responses to various of the *Sow* Plaintiffs' discovery requests. This is defendants' first request for an extension of time to respond to this application.

As the Court is aware from the proposed order recently filed on the docket at Dkt No. 743, defendants are also working on productions of additional *Sow* documents and/or information that are due today and within the next week, and respectfully seek this additional time to properly prepare a response to plaintiffs' application. Yesterday, defendant sought plaintiffs' consent to this application. Today, plaintiffs provided the following position:

"[p]laintiffs apologize for any lack of clarity in this position, but the attorney responding is on jury duty — and Defendants must make the application today. Defendants have had the *Sow* Plaintiffs' positions since Plaintiffs sent a deficiency letter in July, and have known a motion to compel was coming that entire time. They have also had the actual text of the motion for nearly a week. Depositions are slated to resume shortly, and Plaintiffs will be prejudiced by delays past there. To minimize delays, Plaintiffs asked Defendants to, exchange for consent, agree that if the Court orders production, they will not seek more time than seven weeks — which, given that the various charts stated many items at issue would be produced by April 15, is hardly a demand at all. Since Defendants apparently intend to ask for more than those seven weeks, Plaintiffs believe the additional week in delay in briefing issues Defendants have been aware of for months is unduly prejudicial."

This letter, however, is not intended as a substantive response to plaintiffs' September 21, 2022 letter but to request an extension of six days to prepare the response.

Thank you for your consideration herein.

Respectfully submitted,

Bridget V. Hamill s/

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Special Federal Litigation Division

cc: ALL COUNSEL (via ECF only)